

MARK D. WESBROOKS (AZ State Bar No. 018690)

THE WESBROOKS LAW FIRM, P.L.L.C.

15396 N. 83rd Ave., Ste. C100

Peoria, Arizona 85381

Phone: (602) 262-0390

Fax: (888) 477-5598

mwesbrooks@gmail.com

(Admitted Pro Hac Vice)

Attorney for Plaintiffs, Robert Williamson, III and Vicki's Vodka, LLC and
Cross/Plaintiff Catherine Waken-Williamson

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBERT WILLIAMSON, III an
individual,

Plaintiff,

vs.

VICTORIA L. GUNVALSON, an
individual; DAVID BROOKS AYERS, an
individual,

Defendants.

DAVID BROOKS AYERS, an individual,

Counterclaimant,

vs.

ROBERT WILLIAMSON, III, an
individual; CATE WAKEN-
WILLIAMSON, an individual; and
ANGELA TORRES, an individual,

Counterdefendants.

BASE CASE NO.:
2:13-cv-01019-JAD- GWF

MEMBER CASE NO.:
2:13-cv-02022-JAD-GWF

**EMERGENCY MOTION TO
CONTINUE HEARING ON
PLAINTIFFS' MOTIONS FOR
DEFAULT JUDGMENT**

1 Plaintiffs Robert Williamson, III and Vicki's Vodka, LLC (collectively
2 Plaintiffs") and Chapter 13 Trustee Russell A. Brown, through Counsel, Mark D.
3 Wesbrooks of The Wesbrooks Law Firm, PLL (Collectively "Plaintiffs") respectfully
4 move the Court to continue the hearing on Plaintiff's Motion for Default Judgment,
5 currently scheduled for March 2, 2020 at 2:00 p.m.(Doc.183) to an alternate date and
6 time due to conflict of Plaintiff's Counsel.
7
8

9 Lead counsel has been diagnosed with pneumonia and is prohibited to travel,
10 pursuant to doctor's order and recommendation.
11

12 Also, Plaintiff, Robert Williamson, whose testimony must be presented, has only
13 recently informed counsel that March 2, 2020 hearing date conflicts with his new
14 employment advising that such early absence from work will cause Plaintiff to lose his
15 job. Williamson and his Counsel reside outside of Nevada.
16

17 Plaintiff's Counsel suggests that one of the following dates would work:

- 18 • Wednesday, March 18, 2020
- 19 • Thursday, March 19, 2020
- 20 • Friday, March 20, 2020
- 21 • Wednesday, March 25, 2020 through Friday, March 27, 2020
- 22 • Monday, March 30, 2020 through Tuesday, March 31, 2020
- 23 • Thursday, April 2 through Friday, April 3, 2020
- 24 • Monday, April 6, 2020
- 25
- 26
- 27
- 28

1 This Motion is not sought for purposes of delay, but rather so that justice may be
2 achieved.

3
4 A proposed Order is attached.

5 DATED this 27th day of February 2020,

6 **THE WESBROOKS LAW FIRM, P.L.L.C.**

7
8 By: /s/Mark D. Wesbrooks

9 Mark D. Wesbrooks, Esq.

10 *Attorneys for Robert Williamson,*

11 *Catherine Williamson, & Vicki's Vodka, LLC*

CERTIFICATE OF SERVICE

I, Mark D. Wesbrooks, hereby certify that on February 27 2020, I filed through the Court's ECF system and served either through the ECF system or by electronic mail the foregoing document described as: **EMERGENCY MOTION TO CONTINUE HEARING ON PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT** using the Court's electronic filing system. A copy of the foregoing document(s) will be served via the Court's electronic filing system on interested parties in this action, or by email/regular mail as follows:

2:13-cv-01019-JAD-EJY Notice has been electronically mailed to:

Tony L Abbatangelo (Terminated) Tony@paulpaddalaw.com,
arelice@paulpaddalaw.com

Edward Randall Miley emiley@mileylaw.com

Michael D. Mazur complaint@mazurbrooks.com

A. Mark Wesbrooks mwesbrooks@gmail.com, wesbrooksefax@gmail.com

2:13-cv-01019-JAD-EJY Notice has been delivered by other means to:

Angela Torres
6715 Rim Rock Circle, Northwest
Albuquerque, NM 87120

Michael Nicholson
P.O. Box 32
Calistoga, CA 94515

/s/Jacob Rodriguez